

EPA Appendix F - Risk Assessment # 32

Comment:

Section 8.5: The text here notes that the remediation workers were assumed to be classified as radiation workers, and thus any potential risks were evaluated using RESRAD. It might be beneficial to also calculate potential remediation worker risk using EPA exposure parameters as was done for grounds keeping workers, in order for the reader to better understand the potential risks to remediation workers.

Discussion:

Risks to remediation (radiation) workers during construction were evaluated using EPA's exposure parameters and presented in Section 8.3.4 of the previous draft of Appendix F. This evaluation has been expanded in the current version of Appendix F to include effects (risks and HI's) from non-radiological constituents.

Doses to these same workers were also calculated using RESRAD. Exposure parameters used in these RESRAD simulations were consistent with those used in EPA's PRG calculator.

Proposed Text Change:

The proposed changes to the risk assessment text and tables have been incorporated into the current draft of Appendix F. Sections 9-12 of Appendix F are currently being revised as updated information on schedules, material handling processes and transportation requirements become available.

EPA FEEDBACK:

EPA generally accepts this response; however, we will need to see the final SFS report to make sure the changes fully address this issue.